

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

In the Matter of the Search and Seizure of )  
 )  
Black Chrysler 300 with Alaska license ) Case No. 3:21-mj-00274-MMS  
plate LEM339, and VIN:  
2C3CCAGG8KH631644 and is registered )  
Jimmy GREEN Jr. )  
 )  
 )



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**AFFIDAVIT IN SUPPORT OF**  
**AN APPLICATION FOR A SEARCH WARRANT**

I, **Dale R. Boothroyd**, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION**

1. This affidavit is being submitted in support of an application for a search warrant for a Black 2019 Chrysler 300 bearing Alaska plate LEM339, VIN, 2C3CCAGG8KH631644 and is registered Jimmy GREEN Jr. (the “**Target Vehicle**”); as such, it does not include all the information known to me as part of this investigation, but only information sufficient to establish probable cause for the requested search warrant.

2. I have personally participated in the investigation set forth below. I am familiar with the facts and circumstances of the investigation through my personal participation, from discussions with other agents of the DEA and other law enforcement officers. Unless otherwise noted, wherever in this affidavit I assert that a statement was made, the information was provided by another DEA agent or law enforcement officer. Such statements are among many statements made by others and are stated in substance and in part unless otherwise indicated. In addition, this affidavit is based on information from the following sources:



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a. Oral and written reports about this and other investigations which I have received from federal agents and local law enforcement;

b. Public records;

c. My training and experience as a Special Agent and the training and experience of Special Agents of the DEA and other law enforcement officials.

3. As set forth below, there is probable cause to believe that Jimmy GREEN Jr. and others, known and unknown, have committed and continue to commit crimes including distribution of controlled substances and possession of controlled substances with intent to distribute in violation of 21 U.S.C. § 841(a)(1), and conspiracy to commit those offenses in violation of 21 U.S.C. § 846.

4. There is also probable cause to believe that the vehicle described in Attachment A will contain items of evidence that will enable investigators to more fully identify the names, phone numbers, and residences of associates of GREEN Jr. and others known and unknown; and to identify the dates, times, and places for commission of illegal activities, including locations of drug sales, details surrounding drug shipments, methods and means of drug transportation and smuggling, and methods and means of transporting and/or laundering drug proceeds.

### **AGENT'S BACKGROUND**

5. I have been employed as a Task Force Officer with the Drug Enforcement Administration since October of 2018. Prior to my assignment with the Drug Enforcement Administration, I was assigned to the Statewide Drug Enforcement Unit with the Alaska



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State Troopers from April 2018 to September 2018. Prior to my assignment with AST, I was assigned to uniformed patrol with the Anchorage International Airport Police/Fire Department for six years. Thus, in total I have approximately 10 years of law enforcement experience.

6. During the course of your affiant's law enforcement career, I have written and/or executed numerous search and seizure warrants for narcotics, dangerous drugs, and related records, and assisted in the seizure of hundreds of thousands of dollars in proceeds and/or assets derived from such illegal activity.

7. During the course of my employment as a Law Enforcement Officer, I have gained experience in conducting drug investigations and have received the benefit of many years of such experience of fellow agents, investigators and officers.

8. During the course of my employment with the these three agencies, I have worked in an undercover capacity and conducted investigations of controlled substances violations in conjunction with agents, investigators and officers from other jurisdictions. I have also worked with and conducted investigations utilizing confidential sources. I have also conducted or assisted in investigations which have led to the arrest and conviction of persons for violations dealing with the sale, possession and/or manufacture of controlled substances, and the seizure and forfeiture of assets. As part of these investigations, I have able to interview arrested subjects and their associates. Through these interviews, your Affiant has learned how and why these offenders conduct various aspects of their drug trafficking activities, to include communicating, manufacturing, packaging, distribution, transportation and concealment of controlled substances and assets and money laundering.



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9. I attended the Alaska Law Enforcement Training Academy #12-02 where I received 947 hours of training. I have obtained my Intermediate Police Certificate from the Alaska Police Standards Council. I have attended a 40 hour "Task Force Officer" school in Quantico, VA administered by the Drug Enforcement Administration. I have attended a 40 hour "Jetway" training course presented by the Drug Enforcement Administration and El Paso Intelligence Center. I have attended a 40 hour "Undercover Survival and Tactics" course presented by the Midwest Counterdrug Training Center. I have also attended a 7 hour course on Drugs in Alaska at the State Crime Laboratory. I have obtained an A.A.S degree from Finger Lakes Community College, graduating in 2009 with a major in Conservation Law Enforcement.

10. Based upon my experience, training, and information I have received from officers of other Federal, State and local law enforcement agencies involved in the investigation of controlled substance offenses and proceeds derived from the illegal possession and sale of controlled substances, I am aware of the following information about individuals involved in the illegal distribution of illegal controlled substances:

a. That drug dealers often place assets, including accounts at financial institutions, in names other than their own to avoid detection by government or other law enforcement agencies. That even though these assets are in other names, the drug dealers continue to use these assets and exercise dominion and control over them.

b. That even though these assets are in other names, the drug dealers continue to use these assets and exercise dominion and control over them.



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c. That drug dealers frequently maintain on-hand amounts of United States currency in order to maintain and finance their ongoing illegal drug business.

d. That drug dealers often maintain books, records, receipts, notes, ledgers, computers, computer disks, tickets, money orders, cashier's checks, wire transfer receipts, and similar drug related financial documents and records pertaining to the transportation, ordering, sale and distribution of illegal drugs.

e. That drug dealers commonly "front" (provide illegal drugs on consignment) to their clients and often keep the aforementioned items so they can account for their drugs, the money owed for these drugs, and who has or owes for these drugs.

f. That the aforementioned books, records, receipts, notes, ledgers, tickets, money orders, cashier's checks, and similar financial documents and records, including computers, computer disks, diskettes, and hard drives, and other media are maintained where the drug dealers have ready access to them. Often the described records and documents are maintained on computers and electronic media in the drug trafficker's home.

g. That it is common for drug dealers to conceal contraband, large amounts of currency, precious metals, jewelry, address lists, telephone lists, proceeds of drug sales, and records of drug transactions in secure locations within their residences, yards, garages, offices, businesses, automobiles, safes, safe deposit boxes, and obscure locations known only to them, i.e., mail drops, mini storage warehouses,



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etc., for ready access and to conceal the same from law enforcement authorities.

h. That persons involved in illegal drug trafficking conceal in their residences, yards, offices, businesses, safes, garages, storage buildings, vehicles, safe deposit boxes, and obscure locations, caches of drugs, large amounts of currency, weapons, financial instruments, precious metals, jewelry, and other items of value and/or proceeds from drug transactions and evidence of financial transactions relating to obtaining, transferring, secreting, or spending of money made from engaging in illegal drug trafficking activities. Also, drug dealers frequently change vehicles and register vehicles in other names to avoid detection by law enforcement personnel.

i. That drug dealers often purchase expensive vehicles, businesses and residences with the proceeds from their drug transactions. Also, that drug dealers frequently change vehicles and register vehicles in other names to avoid detection by law enforcement personnel.

j. That drug dealers amass large proceeds from the sale of illegal drugs, they often attempt to legitimize their profits and maintain evidence of financial transactions relating to the obtaining, transferring, secreting or spending of large sums of money derived from their illegal drug distribution activities. That to accomplish these goals, drug dealers utilize, including but not limited to, foreign and domestic banks and their attendant services, securities, cashier's checks, money drafts, letters of credit, brokerage houses, real estate, shell corporations, business fronts, telephones, cellular telephones, facsimile machines, digital and various paging devices, and two-way radio systems. Furthermore, drug dealers frequently change telephone numbers, paging



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devices and telephone instruments.

k. That drug dealers commonly maintain addresses and telephone numbers in books or papers which reflect names, alias names, addresses, and telephone numbers for their associates in their illegal drug trafficking.

l. That drug dealers take or cause to be taken photographs, video and audiotapes of themselves, their associates, their property, and their illegal products. Furthermore, these drug dealers often maintain these photographs, video and audiotapes in their residences, offices, safes, garages, storage buildings, vehicles and safe deposit boxes.

m. That drug dealers frequently keep paraphernalia for packaging, diluting, weighing, and distributing the illegal drugs. Furthermore, this paraphernalia includes, but is not limited to, scales, plastic bags, diluting or "cutting" agents, boxes, trash compactors, heat sealers, and sealing tape.

n. That federal courts have recognized that unexplained wealth is probative evidence of crimes motivated by greed, and in particular, illegal trafficking in controlled substances.

o. That drug traffickers very often possess firearms and other weapons for the purpose of protecting their drug trafficking enterprises from the efforts of law enforcement authorities as well as from persons who might attempt to steal any drugs or money possessed by the drug traffickers.

p. That drug traffickers often maintain extra residences as stash houses, meeting locations, and temporary housing for drug associates. These residences are





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frequently rented, purchased or titled in others names even though the residences remain in the control of the drug traffickers.

11. In my experience as an investigator, illegal drug trafficking is a continuing activity over months and even years. Illegal drug traffickers typically obtain and distribute controlled substances on a regular basis much as a distributor of a legitimate commodity would purchase stock for sale, and similarly, drug traffickers will have an inventory which will fluctuate in size depending upon the demand for the product. I find that it is common for drug traffickers to keep records of his illegal activities for a period extending beyond the time during which he actually possesses illegal controlled substances, in order to maintain contact with their criminal associates for future drug transactions, and so that they can have records of prior transactions for which they might still be owed money, or might owe someone else money. Drug traffickers frequently use third parties to transport shipments of illegal drugs and cash proceeds from the sale of illegal drugs. These third parties use a variety of methods to transport shipments of illegal drugs and cash, including automobiles and parcel delivery services.

### **BACKGROUND OF THE INVESTIGATION**

12. On April 29th, 2021, the United States District Court for the District of Alaska issued an arrest warrant (3:21-CR-00042-JMK-MMS) for Jimmy GREEN Jr. for Conspiracy to distribute controlled substances.

13. On May 2nd, 2021, at approximately 1858 hours, Alaska State Trooper Lt. Shayne Calt conducted a traffic stop, unrelated to the warrant, on a Black 2019 Chrysler





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300 with dealer plates (the plate assigned to the vehicle is LEM339, registered to Jimmy GREEN. The traffic stop was conducted for speeding at mile 33 of the Glenn Highway.

14. Lt. Calt informed GREEN of his federal warrant, upon learning this, GREEN smashed two of his three phones on the asphalt, in an apparent effort to prevent law enforcement from getting evidence off of them.

15. TFO D. Boothroyd and SA D. Rose met Lt. Calt at Tikahtnu Commons and transferred custody of GREEN. At approximately 2000 hours, TFO Boothroyd advised GREEN of his Miranda Rights. GREEN stated he understood his rights and agreed to speak. GREEN stated he was not currently being represented and that he just had an attorney call previously to try and get information. GREEN was transported to the DEA Anchorage district office. GREEN was remanded to Anchorage Jail by APD.

16. GREEN's vehicle was impounded by the Alaska State Troopers at Matanuska Towing and Recovery. On May 3rd, 2021, Anchorage Airport Police officer Catherine Scott and K-9 "Skye" conducted a sniff of GREEN's vehicle. Officer Scott advised K-9 "Skye" alerted to the odor/presence of controlled substances emitting from GREEN's vehicle (see K-9 affidavit, attachment <sup>C</sup> ~~X~~). <sup>DEB</sup> 5/11/21

### CONCLUSION

17. Based on the foregoing, Affiant has probable cause to believe that Jimmy GREEN Jr. and others known and unknown have committed and continue to commit crimes, including distribution of controlled substances and possession of controlled substances with intent to distribute in violation of 21 U.S.C. § 841(a)(1) conspiracy to



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commit those offenses in violation of 21 U.S.C. § 846, use of a communication facility to facilitate a controlled substance offense in violation of 21 U.S.C.

18. I also have probable cause to believe that the vehicle described in Attachment A will contain items of evidence that will enable investigators to more fully identify the names, phone numbers, and residences of associates of GREEN and others known and unknown; and to identify the dates, times, and places for commission of illegal activities, including locations of drug sales, details surrounding drug shipments, methods and means of drug transportation and smuggling, and methods and means of transporting and/or laundering drug proceeds.

19. Based on the information provided herein, I submit there is probable cause to search the **TARGET VEHICLE**, a Black 2019 Chrysler 300 bearing Alaska plate LEM339, VIN, 2C3CCAGG8KH631644 and is registered Jimmy GREEN Jr.

RESPECTFULLY SUBMITTED,



Dale R. Boothroyd  
Take Force Officer,  
Drug Enforcement Administration

Subscribed and sworn pursuant to Fed.R.Crim.P. 4.1 & 41(d)(3) on: May 11, 2021.



UNITED STATES MAGISTRATE JUDGE